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Specially Appearing for Defendant American International Group, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, NORTHERN DIVISION

TRENTON FEED COOPERATIVE, a Utah corporation; PLANTERS COTTON OIL MILL, INC., an Arkansas corporation,

Plaintiffs.

VS.

AMERICAN INTERNATIONAL GROUP, INC., a Delaware corporation; AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY, an Alaska corporation; AMERICAN INTERNATIONAL SURPLUS LINES AGENCY, INC., a New Jersey corporation; AIG TECHNICAL SERVICES, INC., a Delaware corporation; and AG STATES AGENCY, L.L.C., a Minnesota limited liability company,

Defendants.

AMERICAN INTERNATIONAL GROUP, INC.'S MOTION TO DISMISS (RULE 12(B)(2))

Civil No.: 1.03-CV-131

Judge: Ted Stewart



Defendant American International Group, Inc. by and through its counsel of record, Gary L. Johnson and Martha Knudson of RICHARDS, BRANDT, MILLER & NELSON, respectfully moves this Court for an Order of Dismissal pursuant to Federal Rules of Civil Procedure Rule 12(B)(2). American International Group, Inc. is entitled to this Order because this Court has no personal jurisdiction over this defendant.

DATED this ______ day of December, 2003.

RICHARDS, BRANDT, MILLER & NELSON

GARY L. JOHNSON MARTHA KNUDSON

Attorneys for Defendant American International Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing instrument was mailed, first-class, postage prepaid, on this _____ day of December, 2003, to the following:

Douglas J. Parry Jennie B. Garner PARRY ANDERSON & GARDINER 60 East South Temple, Suite 1270 Salt Lake City, Utah 84111

Attorneys for Plaintiffs

Michael Skolnick KIPP AND CHRISTIAN 10 Exchange Place, Suite 400 Salt Lake City, Utah 84111

Attorneys for Defendant AG States Agency, L.L.C.

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